

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:

GENERAL MOTORS LLC
IGNITION SWITCH LITIGATION

*This Document Relates to the Plaintiffs in the Actions
Listed on the Attached Exhibit A*

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)
) No. 14-MD-2543 (JMF)

) No. 14-MC-2543 (JMF)

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) Hon. Jesse M. Furman
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)

**DECLARATION IN SUPPORT OF THE FIRMS' MOTION TO WITHDRAW AS
COUNSEL FOR PLAINTIFFS LISTED IN EXHIBIT A**

Robert C. Hilliard declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm of Hilliard Martinez Gonzales, L.L.P. (formerly Hilliard Muñoz Gonzales). Hilliard Martinez Gonzales, L.L.P. and Thomas J. Henry Injury Attorneys (together hereinafter the "Firms") jointly represent the Plaintiffs in the captioned litigation.
2. I have personal knowledge of the facts and circumstances that I describe below, and I submit this declaration in support of the Firms' Motion to Withdraw as Counsel for Plaintiffs.
3. Prior to February 2018, the Plaintiffs who are listed on Exhibit A to the Firms' Motion to Withdraw had communicated to Attorneys that Plaintiffs no longer wished to be represented by Attorneys in connection with their GM Auto Recall Claims.
4. On February 8, 2018, the Firms sent a letter via regular mail, certified mail, and electronic mail (to plaintiffs who provided an email address) advising the Plaintiffs who are listed on Exhibit A to the Firms' Motion to Withdraw that the Firms intended to ask the Court's

permission to withdraw from representing them because Plaintiffs had advised Attorneys that Plaintiffs no longer wished to retain the services of Attorneys.

5. The Firms' February 8, 2018 letter also offered to voluntarily dismiss Plaintiffs' claims so that Plaintiffs could refile them elsewhere if they wished, but Plaintiffs did not elect to voluntarily dismiss their claims.
6. The Firms' February 8, 2018 letter also advised Plaintiffs to seek other representation if Plaintiffs did not voluntarily dismiss their claims, but based on the Firms' knowledge and belief, Plaintiffs have not hired alternative representation.
7. The Firms are not asserting a charging lien or a retaining lien against any of these Plaintiffs. The Firms' withdrawal from representing these Plaintiffs will not have an adverse impact on Plaintiffs' interests or claims and will not have any impact on the timing or schedule of this litigation.

Dated: February 28, 2018

By: /s/ Robert C. Hilliard
Robert C. Hilliard

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2018, I electronically filed the foregoing using the CM/ECF system which will serve notification of such filing to the email of all counsel of record in this action. I also certify that a copy of this document was sent by U.S. Mail to the individuals listed on Exhibit A.

By: /s/ Robert C. Hilliard
Robert C. Hilliard